

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals  
Service Standard Changes, 2021

Docket No. N2021-1

PUBLIC REPRESENTATIVE FIRST INTERROGATORIES TO UNITED STATES  
POSTAL SERVICE WITNESS STEVEN MONTEITH (USPS-T-4)

(May 19, 2021)

Pursuant to 39 C.F.R. § 3020.117, the Public Representative hereby submits the following interrogatories and requests for production of documents.

Respectfully Submitted,  
/s/ Samuel Poole  
Samuel Poole  
Public Representative for  
Docket No. N2021-1

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1. Please explain how the Postal Service intends to address the public perception that the proposed change will “slow down” the mail.
2. Please explain, as completely as possible, why the proposed changes will not result in a slower average speed for First-Class Mail piece, relative to the *status quo*.
3. Please refer to pages 19-20, lines 18-20 and 1-5, of witness Monteith’s testimony. Witness Monteith states that the proposed changes “are unlikely to materially impact the third top driver of customer satisfaction: fast delivery.” Witness Monteith’s testimony cites a survey included in a United States Postal Service Office of the Inspector General report, which found that 71 percent of respondents expected their sent to mail to arrive in seven days. Witness Monteith finds that this survey “suggests that some customers may not be impacted by the service standard changes as they have already expected longer delivery times than our current service standards.”
  - a. Please describe any corroborating analysis or information that the Postal Service has reviewed suggesting that mailers believe the current service standard is seven days.
  - b. Please confirm that the Postal Service views the survey as a reliable indicator of consumer expectations regarding First-Class Mail delivery time. If confirmed, please explain any steps the Postal Service has taken to improve communication with mailers regarding the service and value being provided under current service standards.